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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 27, 1999

Federal Communications Commission
Washington, D.C.

RE:

Comments of Bick Broadcasting Company
Docket 99-25, RM9208, RM9242

Presently the Commission is considering the creation of a Low Power FM (LPFM) radio broadcast service within the existing FM broadcast band of frequencies of 88-108 MHz. The comments of Bick Broadcasting Company are not intended to debate the potential merit of such a service but to appeal for reasonable technical standards which will preserve the existing FM service.

Among the proposals under consideration, is to eliminate the 2nd and 3rd adjacent channel spacing requirements to existing stations. Bick Broadcasting believes this proposal would create high levels of interference within 1 mile of all LPFM stations and therefore opposes the proposal.

Many current FM stations transmit from a site many miles from the city of license. This is often required to accommodate the construction of a suitable tower and also comply with local zoning laws in addition to aviation concerns. The transmit antennas of LPFM's could much more easily be located within city limits, perhaps on building roofs, water towers even home garage roofs. The signal of such LPFM's would overload receivers nearby and easily prevent the reception of a station two or three channels away.

Bick Broadcasting is the licensee of five FM stations in small towns covering no more than a few square miles each. Four of the stations are transmitted from transmitter sites three to fourteen miles from the city of license. With the elimination of second and

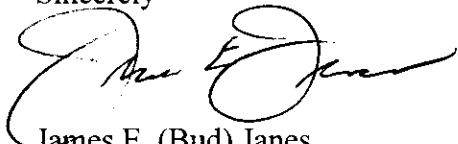
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third adjacent separation, an existing station could easily find a new LPFM two channels above its frequency and an additional LPFM two channels below it's frequency all within the same city of license. Most of the Bick stations rely on regional audience and business, however nearby towns could also be effected similarly. Although I have no technical studies to offer, my 25 years in the business tells me that new LPFM's would often create a blanketing area which would preclude the reception of a station two or three channels away. An LPFM station could easily blanket a large percentage of a small geographical town. Two LPFM stations, one two channels below and one two channels above an existing station could blanket all or much more than half of a town, precluding reception of the existing station.

For whatever merits a new LPFM service might offer, certainly it is highly in the public interest to maintain the current FM service first.

In conclusion, Bick Broadcasting strongly opposes the removal of second and third adjacent standards in the FM rules and does and will oppose in technical changes that degrades the current FM band.

Sincerely

A handwritten signature in black ink, appearing to read "James E. Janes", written in a cursive style.

James E. (Bud) Janes
President, Bick Broadcasting Co.